

# EXHIBIT G

BRACH | EICHLER<sup>LLC</sup>

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July 31, 2018

**VIA EMAIL**

Pádraig P. Flanagan, Esq.  
Florio Perrucci Steinhardt and Fader, LLC  
235 Broubalow Way  
Phillipsburg, NJ 08865

**Re: Garcia/Titilations Amended Answers to Interrogatories**

Dear Mr. Flanagan:

This firm represents Plaintiff Jane Doe 1 in the above-captioned matter. As set forth below, Plaintiff hereby amends her responses to Defendants' First Set of Interrogatories as set forth below.

First, Plaintiff supplements any references to documents in her answers to Defendants First Set of Interrogatories and her Responses to Defendants First Request for the Production of Documents with the documents produced herewith Bates Stamped: P00017-321. For your convenience, these documents include phone records for Plaintiff and her husband for the time period she claims to have worked at Titilations, and pictures she took inside the dressing room of Titilations with time/date stamps. The redactions in the phone records include information related to phone numbers unrelated to Plaintiff or her husband, and are not relevant.

Next, Plaintiff amends her responses to Interrogatories Nos. 16 and 19 as follows:

The exact amount of damages and time worked is not ascertainable at this time given Defendants' failure to keep accurate time records as required by law. However, Plaintiff has attempted to estimate, as best she can, through sheer recollection that number of hours she worked during the weeks Defendants employed her:

5 Penn Plaza, 23rd Floor  
New York, New York 10001  
212.896.3974

101 Eisenhower Parkway  
Roseland, New Jersey 07068  
973.228.5700

2875 South Ocean Blvd., Suite 200  
Palm Beach, Florida 33480  
561.899.0177

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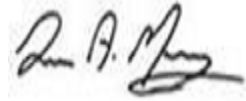
<b>Week of</b>	<b>Est. Hours Worked Lo</b>	<b>Est. Hours Worked Hi</b>	<b>Min Wage</b>	<b>Damages Lo</b>	<b>Damages Hi</b>
8/14/2016	14	24	\$8.38	\$117.32	\$201.12
8/21/2016	21	35	\$8.38	\$175.98	\$293.30
8/28/2016	35	45	\$8.38	\$293.30	\$377.10
9/4/2016	21	35	\$8.38	\$175.98	\$293.30
9/11/2016	21	35	\$8.38	\$175.98	\$293.30
9/18/2016	14	24	\$8.38	\$117.32	\$201.12
9/25/2016	14	24	\$8.38	\$117.32	\$201.12
10/2/2016	14	24	\$8.38	\$117.32	\$201.12
10/9/2016	21	35	\$8.38	\$175.98	\$293.30
10/16/2016	21	35	\$8.38	\$175.98	\$293.30
10/23/2016	21	35	\$8.38	\$175.98	\$293.30
10/30/2016	21	35	\$8.38	\$175.98	\$293.30
11/6/2016	21	35	\$8.38	\$175.98	\$293.30
11/13/2016	21	35	\$8.38	\$175.98	\$293.30
11/20/2016	21	35	\$8.38	\$175.98	\$293.30
11/27/2016	21	35	\$8.38	\$175.98	\$293.30
12/4/2016	21	35	\$8.38	\$175.98	\$293.30
12/11/2016	21	35	\$8.38	\$175.98	\$293.30
12/18/2016	21	35	\$8.38	\$175.98	\$293.30
12/25/2016	14	24	\$8.38	\$117.32	\$201.12
1/1/2017	21	35	\$8.44	\$175.98	\$293.30
1/8/2017	21	35	\$8.44	\$175.98	\$293.30
1/15/2017	7	9	\$8.44	\$58.66	\$75.42
			Estimated Actual Damages	\$3,754.24	\$6,150.92
			Liquidated Damages	\$3,754.24	\$6,150.92
			<b>Total Damages</b>	<b>\$7,508.48</b>	<b>\$12,301.84</b>

Plaintiff reserves the right to amend and supplement this response at the appropriate time as discovery in this matter continues.

Please accept this amendment as though certified and/or in lieu of a more formal response. We will assume that this is acceptable to you unless we hear to the contrary within the next ten (10) days.

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Very truly yours,

A handwritten signature in black ink, appearing to read "Lucas A. Markowitz", written in a cursive style.

Lucas A. Markowitz

LAM:pa